**Amendments to the Drawings**

The attached replacement drawing sheet, containing **Figures 3** and **4**, comprises sheet 2/3 of the formal drawings that were filed on August 3, 2001. The attached replacement drawing sheet is submitted pursuant to the Examiner's request because drawing sheet 2/3 of the formal drawings was missing from the Patent and Trademark Office file of the application.

Attachment: Replacement Drawing Sheet

## Remarks/Arguments

The Examiner is thanked for the courteous telephone interview granted Applicants' representative on December 7, 2004. Claim 1 was discussed during the interview, and the Examiner requested that Applicants present their arguments in detail in this Response for further consideration by the Examiner.

Claims 1-21 remain pending in the application. Applicants have carefully considered the cited art and the Examiner's comments, and believe claims 1-21 patentably distinguish over the cited art in their present form. Reconsideration of the rejection is, accordingly, respectfully requested in view of the following comments.

### I. Drawings

The Examiner has indicated that formal drawing sheet 2 of 3 was missing from the Patent and Trademark Office file of the application. Three sheets of formal drawings, including sheet 2/3, were filed in the Patent and Trademark Office on August 3, 2001, as confirmed by the Post Card Receipt stamped on August 6, 2001. A copy of sheet 2/3 of the drawings as filed on August 3, 2001, is attached hereto to replace the sheet missing from the file. Also attached is a copy of the above-referenced Post Card.

### II. 35 U.S.C. § 102, Anticipation

The Examiner has rejected claims 1-21 under 35 U.S.C. § 102(e) as being anticipated by Roberts et al. (U.S. Patent No. 6,233,010). This rejection is respectfully traversed.

In rejecting the claims, the Examiner states:

> As to claims 1, 10 and 18-21, Roberts teaches the invention including a method for providing access to alternate formats within an electronic document, comprising: parsing an electronic document (see, figures 2-7 and col. 2, lines 12-21); parsing an alternate format attribute of an image element in the electronic document (see abstract and figures 2-7); displaying the electronic document, wherein the electronic document contains a default image corresponding to said image element (figures 9-12 and col. 11, lines 18-55); specifying a user interface, wherein the user interface allows a user to select alternate formats of the image (see, figures 2-7 and col. 2. lines 12-21); presenting the user interface in response

to a user input command (see, abstract and figures 9-12 and 2, lines 38-64); and responsive to receiving user selection, replacing the default image with an alternate representation generated from the alternate format attribute (figures 9-12 and col. 2, lines 38-64 and col. 11, lines 18-55).

Office Action dated October 5, 2004, pages 4 and 5.

Claim 1 of the present application is as follows:

1. A method for providing access to alternate formats within an electronic document, comprising:
parsing an electronic document;
parsing an alternate format attribute of a image element in the electronic document;
displaying the electronic document, wherein the electronic document contains a default image corresponding to said image element;
specifying a user interface, wherein the user interface allows a user to select alternate formats of the image;
presenting the user interface in response to a user input command; and
responsive to receiving user selection, replacing the default image with an alternate representation generated from the alternate format attribute.

Initially, Roberts is not directed to a method "for providing access to alternate formats within an electronic document" as recited in claim 1. Instead, Roberts is generally directed to an electronic still video camera having operator selectable picture compression in one of a plurality of operator selectable digital data formats recordable on a standard magnetic diskette common to personal computers (PCs). The diskette is removable from the camera for direct insertion into a PC that contains an appropriate decompression algorithm whereby the digital image is in a format compatible for use with word processing and other applications on PCs.

Roberts also does not disclose either "parsing an electronic document" or "parsing an alternate format attribute of a image element in the electronic document" as are recited in claim 1. Col. 2, lines 12-21 of Roberts, referred to by the Examiner as disclosing "parsing an electronic document" reads as follows:

It is the object of this invention to provide an improved electronic still camera with operator selectable picture compression in one of a plurality of

operator selectable digital data formats recordable on a standard removable magnetic diskette common to personal computers.

It is a further object of this invention to provide an improved electronic still camera that provides digital image files for immediate and direct incorporation into popular word processing, desktop publishing, and other software programs on PCs.

Roberts describes that a picture can be compressed in one of a plurality of digital data formats selectable by an operator to provide digital image files usable with a PC. The above recitation does not disclose "parsing an electronic document". Roberts does not appear to contain any disclosure relating to parsing, and certainly does not describe "parsing an electronic document".

The Abstract in Roberts, referred to by the Examiner as disclosing "parsing an alternate format attribute of a image element in the electronic document", reads as follows:

> A digital camera includes a digital memory system having a control unit for checking for proper format initialization of a removable digital memory element for performing format initialization of the memory element when necessary.

The Abstract also does not discuss parsing, and certainly does not disclose "parsing an alternate format attribute of a image element in the electronic document" as required by claim 1. Roberts is directed to compressing a picture and converting a picture from one format to another, and does not parse either an electronic document or an alternate format attribute of an image element in an electronic document.

Roberts also does not disclose "displaying the electronic document, wherein the electronic document contains a default image corresponding to said image element" as recited in claim 1. The Examiner refers to figures 9-12 and col. 11, lines 18-55 as disclosing this feature. Applicants respectfully disagree.

Col. 11, lines 18-55 reads as follows:

> FIG. **9** and FIG. **10** illustrate the preferred embodiment of the video format translator device in accordance with another aspect of this invention that converts other still video camera formats for example on two inch video diskette to this invention's selectable PC compatible digital format. The general concept of operation is shown in FIG. **10**. In FIG. **9** correspond parts and subassemblies in

translator **40** are shown with like numbers corresponding to FIGS. **2** and **6** having a **40** hyphenation prefix designation and such parts and subassemblies perform similar functions to those described above with reference to FIGS. **2** and **6**. Referring again to FIG. **9**, the translator **40** incorporates the same components utilized in the digital circuit card assembly which houses both the digital control unit **9** and optics processing circuits (pixel multiplexer **7**, A/D **8**, etc. **10-13**). The major difference is that the CCD array **1** is replaced with an input disk drive **25**, for example a two inch (2") video disk drive assembly, and an NTSC video format decoder **26** which converts the composite video signal to an RGB format for processing as described previously.

FIG. **11** displays an alternate embodiment of the video format translator device **40** of the present invention that shows optional inputs **27** and outputs **28** and **29**. The exact same circuitry is utilized that was used for the translator device **40** as shown in FIG. 9 except that inputs **27** for either an NTSC/PAL format or RGB format video signal is provided. This allows video signals from other sources such as a cable TV, CAMCORDER, or other video signal source to be digitized and archived in a PC compatible format. Also, provisions for video output jacks **28** are made to allow either viewing of the image/video source prior to or during image recording. Finally, provisions are made to provide a data output **29** to allow connection to other PC peripherals such as a communications modem, larger/smaller disk drive assembly, optical disk, specialty display or signal processor/analyzer. Either a standard serial, parallel, or Small Computer Standard Interface (SCSI) data port can be readily connected to the auxiliary I/O interface **80**.

The above-reproduced portions of Roberts do not disclose "displaying the electronic document, wherein the electronic document contains a default image corresponding to said image element". As discussed above, Roberts is only concerned with converting images from one format to another, and nowhere describes an electronic image that contains a default image corresponding to an image element.

Col. 8, lines 18-55 of Roberts describes Figures 9-11 of the patent. Figures 9 and 11 illustrate embodiments of a video format translator device, and Figure 10 illustrates the operation of the translator device of Figure 9. In the video format translator device illustrated in Figure 9, the device functions to convert certain still video camera formats, for example, on a two-inch video diskette, to a PC compatible digital format. In the device illustrated in Figure 11, optional inputs are provided for NTSC/PAL and RGB formats to allow signals from camcorders, cable TV or other sources to be digitized and archived in a PC compatible format. These operations do not comprise "displaying the

electronic document, wherein the electronic document contains a default image corresponding to said image element".

Roberts also does not disclose "responsive to receiving user selection, replacing the default image with an alternate representation generated from the alternate format attribute" as recited in claim 1. The Examiner refers to col. 2, lines 38-64 and col. 11, lines 18-55 as disclosing this feature. As indicated above, however, Roberts only describes converting images from one format to another, and does not disclose an electronic image that has a default image corresponding to an image element, or replacing a default image with an alternate representation generated from an alternate format attribute.

For at least all the above reasons, Roberts does not anticipate claim 1, and claim 1 should be allowable over Roberts in its present form.

Claims 2-9 depend from and further restrict claim 1, and are also not anticipated by Roberts, at least by virtue of their dependency. Furthermore, many of these claims recite additional features that are not disclosed in Roberts and should be allowable in their own right as well as by virtue of their dependency. For example, claim 7 depends from claim 1 and recites that the user interface is a tactile menu. Claim 8 depends from claim 1 and recites that a user interface is presented in response to a right click on a computer mouse. The Examiner refers to the Abstract and col. 11, lines 18-55 of Roberts as disclosing these features. Applicants respectfully submit that these features are nowhere disclosed in these portions of Roberts.

Independent claims 18 and 20 are computer program product claim and system claim counterparts to method claim 1. These claims are not anticipated by Roberts for substantially the same reasons as discussed above with respect to claim 1.

Independent claim 10 is as follows:

> 10. A method for accessing alternate formats within an electronic document, comprising:
>
> receiving a display of an electronic document which contains a default image;
>
> entering an input command and receiving a user interface in response, wherein the user interface allows selection of alternate formats for the default image contained in the electronic document;

selecting an alternative format from the user interface; and

displaying an alternate representation, in the selected alternate format, in place of the default image in the electronic document.

As described above, Roberts is directed to converting a picture from one format to another, and is not related to, and does not describe, a method for "accessing alternate formats within an electronic document as specified in claim 10. For reasons also discussed in detail above, Roberts does not disclose "receiving a display of an electronic document which contains a default image", "selecting an alternative format" for the default image from a user interface, or "displaying an alternate representation, in the selected alternate format, in place of the default image in the electronic document.

Claim 10, accordingly, is also not anticipated by Roberts and is believed to patentably distinguish over Roberts in its present form.

Claims 11-17 depend from and further restrict claim 10, and are also not anticipated by Roberts at least by virtue of their dependency.

Claims 19 and 21 are computer program product claim and system claim counterparts to method claim 10. These claims are not anticipated by Roberts for substantially the same reasons as discussed above with respect to claim 10.

Therefore, the rejection of claims 1-21 under 35 U.S.C. § 102 has been overcome.

Furthermore, Roberts does not teach, suggest, or give any incentive to make the needed changes to reach the presently claimed invention. Roberts is not directed to, and does not disclose, a mechanism for providing access to alternate formats within an electronic document, and does not disclose the present invention as recited in claims 1-21. Absent the Examiner pointing out some teaching or incentive to implement Roberts, one of ordinary skill in the art would not be led to modify Roberts to reach the present invention when the reference is examined as a whole. Absent some teaching, suggestion, or incentive to modify Roberts in this manner, the presently claimed invention can be reached only through an improper use of hindsight using the Applicants' disclosure as a template to make the necessary changes to reach the claimed invention.

## III. Conclusion

It is respectfully urged that claims 1-21 patentably distinguish over Roberts, and that this application is now in condition for allowance.

The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

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Respectfully submitted,

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